

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ROSLYN BROWN, *et al.*,

Plaintiffs,

v.

CITY OF PINE LAWN, MISSOURI, *et al.*,

Defendants.

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Case No. 4:17-cv-1542-ERW

SECOND CONSENT MOTION FOR EXTENSION

COME NOW Plaintiffs Roslyn Brown and R.Z. a minor, by Consent of Defendants, and for their Motion for Extension, state as follows:

1. On April 25, 2019 this Court issued an Order (ECF No. 110) extending the time by which Plaintiff should submit a proposed consent judgment to the Court.
2. Since that time, Ms. Brown and her counsel have nearly resolved the Medicare lien that still exists related to Ms. Brown's claims. Although Ms. Brown has received a "Conditional Payment Claim," she has not yet resolved a "Final Claim" that will enable her to fully pay any outstanding Medicare payments she owes.
3. Ms. Brown has also met with financial planners in order to confirm that the funds of her daughter, Plaintiff R.Z., will appropriately be cared for when the settlement funds are dispersed.

4. Ms. Brown and her counsel are optimistic that within 45 days Medicare will finalize any outstanding lien, enabling her to finalize settlement in the case.
5. Plaintiffs request an extension of 45 days, until **Friday, August 9, 2019**, by which to file their stipulation for dismissal, motion for leave to voluntarily dismiss, or proposed consent judgment.
6. Defendant's counsel has consented to the filing of this document.

WHEREFORE, Plaintiffs request this Honorable Court grant their Motion for Extension.

Respectfully Submitted,

ARCHCITY DEFENDERS

By: /s/ John M. Waldron

Blake A. Strobe (MBE #68422MO)

Michael-John Voss (MBE #61742MO)

Sima Atri (MBE #70489MO)

John M. Waldron (MBE #70401MO)

440 N. 4th Street, Suite 390

Saint Louis, MO 63102

855-724-2489

314-925-1307 (fax)

bstrobe@archcitydefenders.org

mjvoss@archcitydefenders.org

satri@archcitydefenders.org

ncarroll@archcitydefenders.org

jwaldron@archcitydefenders.org

Attorneys for Plaintiff